

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,
et al.,

Defendants,

v.

VIRGINIA HOUSE OF DELEGATES, *et al.*,

Intervenor-Defendants

Civil Action No. 3:14-cv-00852-REP-
AWA-BMK

**CONSENT MOTION FOR EXTENSION OF THE PARTIES' BRIEFING SCHEDULE
FOR PLAINTIFFS' SUPPLEMENTAL SUBMISSION IN SUPPORT OF REVISED
SECOND MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

By Order dated April 20, 2020, the Court ordered Plaintiffs to “file a truncated fee award calculation using Richmond, Virginia rates, with supporting affidavit and exhibits, if needed, by May 1, 2020.” ECF No. 423.

Plaintiffs, by counsel, respectfully request that this Court grant an extension of time for the parties to submit Plaintiffs’ briefing—and Defendants’ and Intervenor-Defendants’ responsive briefing, if any—related to the supplemental submission ordered by the Court. Plaintiffs’ counsel has consulted with counsel for Defendants and Intervenor-Defendants, and they consent to Plaintiffs’ request for an extension of time.

Plaintiffs have been working diligently to prepare the supplemental submission, which Plaintiffs anticipate will be supported by additional affidavits supporting Plaintiffs’ requested attorney fee rates. Given the time necessary to secure and finalize those additional supporting affidavits, Plaintiffs ask that the Court extend the parties’ briefing deadlines by one week, which would revise the schedule as follows so as not to diminish the other parties’ time to respond: Plaintiffs’ supplemental filing would be due on or before May 8, 2020, Defendants’ and Intervenor-Defendants’ responses would be due on or before May 22, 2020, and Plaintiffs’ reply to those responses would be due on or before May 29, 2020.

WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request that the briefing deadlines set forth in the Court’s April 20, 2020 Order, ECF No. 423, be extended by one week.

DATED: April 30, 2020

By: /s/ Aria C. Branch

Marc Erik Elias (admitted *pro hac vice*)

Bruce V. Spiva (admitted *pro hac vice*)

Aria Branch (VSB # 83682)

PERKINS COIE LLP

700 Thirteenth Street, N.W., Suite 600

Washington, D.C. 20005-3960

Telephone: 202.434.1627

Facsimile: 202.654.9106

Kevin J. Hamilton (admitted *pro hac vice*)

Abha Khanna (admitted *pro hac vice*)

Ryan Spear (admitted *pro hac vice*)

William B. Stafford (admitted *pro hac vice*)

PERKINS COIE LLP

1201 Third Avenue, Suite 4900

Seattle, WA 98101-3099

Telephone: 206.359.8000

Facsimile: 206.359.9000

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of May, 2020, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the counsel of record in this case.

By /s/ Aria C. Branch _____

Aria C. Branch (VSB #83682)

Perkins Coie LLP

700 13th St. N.W., Suite 600

Washington, D.C. 20005-3960

Phone: (202) 654-6338

Fax: (202) 654-9106

ABranch@perkinscoie.com

Attorneys for Plaintiffs